

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN)
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This document relates to:

*Audrey Ades, et al. v. Islamic Republic of Iran*, No. 1:18-cv-07306 (GBD) (SN)

*Spence et al. v. Kingdom of Saudi Arabia*, 1:18-cv-11971 (GBD) (SN)

**MOTION TO SUBSTITUTE PARTIES PURSUANT TO  
FEDERAL RULE OF CIVIL PROCEDURE 15(d)**

Pursuant to Federal Rules of Civil Procedure 15(d), Plaintiff herein moves the Court to allow substitution of the party as identified in Exhibit A in the above-referenced actions. The individual being substituted into the case is the Personal Representative of an individual killed as a result of the terrorist attacks on September 11, 2001.

Exhibit A identifies the individual to be substituted in the pleading, including the capacity in which he seeks to be substituted, state of residency at the time the complaint was filed, the existing pleadings that refer to the plaintiff, and the decedent of which the plaintiff is the Personal Representative.

Plaintiff proposes that, upon endorsement of Plaintiff's Proposed Order, the substituted party be individually entered as a Plaintiff into the Court's ECF system to ease the burden on the Clerk of the Court's Office and the size of this MDL.

Dated: June 19, 2024

/s/ Jerry S. Goldman

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**EXHIBIT A to Motion to Substitute Party**

	<b>Previous Personal Representative:</b>	<b>Case Information:</b>	<b>Substituted Personal Representative:</b>	<b>State of Residency of Substituted Personal Representative at Filing:</b>	<b>Decedent's Name:</b>
1.	Saundra Faye Woolen as the Personal Representative of the Estate of Tamara Thurman, deceased, on behalf of the Estate, and on behalf of all survivors and all legally entitled beneficiaries and family members of Tamara Thurman	<i>Audrey Ades, et al. v. Islamic Republic of Iran</i> , No. 1:18-cv-07306 (GBD)(SN); <i>Spence et al. v. Kingdom of Saudi Arabia</i> , 1:18-cv-11971 (GBD)(SN)	Emory E. Hackman, Jr. as the Personal Representative of the Estate of Tamara Thurman, deceased, on behalf of the Estate, and on behalf of all survivors and all legally entitled beneficiaries and family members of Tamara Thurman <sup>1</sup>	VA	Tamara Thurman

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<sup>1</sup> Emory E. Hackman, Jr. is already listed as the personal representative of this estate in the other actions filed by Anderson Kill P.C.